11th Floor, Bank of America Tower Post Office Box 11390 1301 Gervais Street (29201) COLUMBIA, SOUTH CAROLINA 29211

TELEPHONE (803) 799-9800 FACSIMILE (803) 376-2219

October 26, 2005

The Honorable Charles Terreni Chief Clerk and Administrator South Carolina Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211

> Re: Application of Pac-West Telecomm, Incorporated for a Certificate of Public Co Convenience and Necessity to Provide Facilities-based and Resold Local Exchange and Interexchange Telecommunications Services in the State of South Carolina (SCPSC Docket No. 2005-294-C)

Dear Mr. Terreni:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition an original and ten (10) copies of a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service appended to the Petition, I am serving all parties of record.

Please clock in a copy of the Petition and return it by our courier.

Should you have any questions with respect to this matter, please do not hesitate to contact me.

> of Dake Very truly yours,

Margaret M. Fox

**Enclosures** 

cc: John J. Pringle, Jr., Esquire Florence P. Belser, Esquire

#### **BEFORE**

## THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2005-294-C

Re: Application of Pac-West Telecomm, Incorporated) for a Certificate of Public Convenience and Necessity to Provide Facilities-based and Resold Local Exchange and Interexchange Telecommunications Services in the State of South Carolina

PETITION TO INTERVENE

In response to the Commission's Notice of the Filing of the Application of Pac-West Telecomm, Incorporated for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

- 1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.
- 2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
- 3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr. Margaret M. Fox McNAIR LAW FIRM, P.A. Post Office Box 11390 Columbia, South Carolina 29211 (803) 799-9800

Attorneys for Intervenor South Carolina

Telephone Coalition

October 26, 2005

Columbia, South Carolina

### **BEFORE**

# THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2005-294-C

Re:	Application of Pac-West Telecomm, Incorporated
	for a Certificate of Public Convenience and
	Necessity to Provide Facilities-based and Resold
	Local Exchange and Interexchange Telecommu-
	nications Services in the State of South Carolina

CERTIFICATE OF SERVICE

I, ElizaBeth A. Blitch, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following party of record by causing said copy to be deposited with the United States Mail, first class postage prepaid to:

John J. Pringle, Jr., Esquire Ellis, Lawhorne & Sims, P.A. 1501 Main Street 5th Floor Columbia, South Carolina 29201

Florence P. Belser, Esquire Office of Regulatory Staff Post Office Box 11263 Columbia, South Carolina 29211.

ElizaBeth A. Blitch, Paralegal

McNair Law Firm, P.A. Post Office Box 11390

Columbia, South Carolina 29211

(803) 799-9800

October 26, 2005

Columbia, South Carolina